

EXHIBIT B

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10 UNITED STATES DISTRICT COURT
11 FOR THE DISTRICT OF MARYLAND
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BAHRAM SHAKERI)
11)
12 Plaintiff)
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14)
15 JEREMY ALLEN)
16)
17 Defendant)
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1)

SECOND AMENDED COMPLAINT

8:21-cv-00549

NATURE OF ACTION

1. This is an action brought by Bahram Shakeri against Defendant Jeremy Allen of Prince
George's County Police Department for defamation and negligence based on his actions of
republishing defamatory statements about Mr. Shakeri made by Delonte West when they
knew the statements to be false.

Deleted: individual officers

Deleted: whose identities are currently unknown

Deleted: the law enforcement officers'

PARTIES

2. Plaintiff Bahram Shakeri is a resident of the Commonwealth of Virginia, with his address
at 7131 Royal Fern Circle Apt 202, Manassas, VA 20111.

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1 3. Jeremy Allen is, or at the least was at the time of the incident, a corporal in the Prince
2 George's County Police Department.

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4 4. The Prince George's County Police Department is the primary law enforcement agency in
5 Prince George's County, Maryland. Prince George's County is its corporate agent and is
6 being sued in that capacity. The department's business address is 14741 Governor Oden
7 Bowie Drive, Upper Marlboro, Maryland 20772.

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JURISDICTION AND VENUE

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10 5. This court has jurisdiction pursuant to 28 U.S.C. § 1332.
11 6. Venue is proper because a substantial part of the events that support this cause of action all
12 occurred within the district.

13

FACTUAL BACKGROUND

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15 7. On or about January 21, 2020, Mr. Shakeri was in MGM National Harbor when Delonte
16 West attacked him for the first time.
17 8. Mr. Shakeri tried to get away to calm the situation down, but he was followed by Mr. West.
18 9. Then when he tried to leave, Mr. West continued to attack and harass him.
19 10. Finally, Mr. West instigated a fight with Mr. Shakeri near the 6700 block of Oxon Hill
20 road.
21 11. Mr. West threw a glass at Mr. Shakeri's head.
22 12. It was only then that Mr. Shakeri in self-defense took action against Mr. West.
23 13. Bystanders who were witnessing the altercation took video and placed it on social media,
24 where Mr. Shakeri can be clearly seen and has been recognized by numerous individuals.

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1 14. Once Mr. West was detained by police, video was taken by Defendant Allen where Mr.
 2 West stated that Mr. Shakeri “approached him with a gun”.

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3 15. Based on investigation of witnesses done at the scene by the Prince George’s County Police
 4 Department, officers were fully aware that Mr. Shakeri did not approach Mr. West with a
 5 gun, and that it was, in fact, Mr. West who instigated the altercation.

6 16. Defendant Allen subsequently sent the video to multiple other officers, including officers
 7 who were not part of the investigation.

8 17. This video was not taken and kept in proper evidence gathering steps for the Prince
 9 George’s County Police Department, but was instead taken on his personal phone and then
 10 shared informally with his colleagues for a purpose other than continuing and preserving
 11 the investigation.

12 18. Despite knowing that Mr. West’s defamatory statements were absolutely false, an officer
 13 of the Prince George’s County Police Department released the video of Mr. West’s
 14 statements to the media, where news outlets like TMZ publicized Mr. West’s statements
 15 against Mr. Shakeri.

16 19. As stated by Chief Hank Stawinski, “It [was] irresponsible for that [video], taken by a
 17 Prince George’s County police officer, to be in the public’s hands...”.

20 20. In October 2020, Plaintiff notified the Prince George’s Police Department and the Prince
 21 George’s County Attorney of his claim.

22 21. Plaintiff received no response from either agency and now files this claim against them for
 23 the tortious actions of their employee(s).

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 25 **COUNT I**
 26 **DEFAMATION *per se***

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Deleted: <#>Plaintiff at this time does not have the
 identification of the individuals officer(s) who were involved in
 grossly negligent acts of releasing the completely false
 information to the media.
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22. Plaintiff reasserts and reiterates allegations in par 1-19 as if set forth herein.
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23. Defendant, through their employee(s), received false statements from Delonte West about
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4 Mr. Shakeri threatening him with a gun, thus making a defamatory statement that Mr. West
5 committed a dangerous felony.

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24. The law enforcement officers, including Defendant Allen, who took the video of Mr. West
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8 making these statements also took statements from other witnesses of the event who made
9 them fully aware that Mr. West's statements were in fact false – that Mr. West was the one
10 who instigated the fight and that Mr. Shakeri did not threaten Mr. West with a gun (let
11 alone even possess a gun).

12
25. Despite knowing the statements were false, Defendant Allen shared this video with his
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14 colleagues for purposes other than continuing and preserving the investigation, which was
15 subsequently published to media outlets, including TMZ, who published the video
16 worldwide on their highly popular website.

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26. As a result of Defendant's actions, Plaintiff has suffered severe emotional distress and
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19 harm.

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27. As a result of Defendant's actions, Plaintiff has suffered damages in an amount to be
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determined at trial, but no less than \$5,000,000.00.

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COUNT II
GROSS NEGLIGENCE

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28. Plaintiff reasserts and reiterates allegations in par 1-24 as if set forth herein.

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Deleted: the law enforcement officer(s)

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1 29. Law enforcement officers, as officers of public duty and safety, have a duty to conduct
2 investigations as neutral individuals, respecting the privacy of those who are victims of
3 crimes.

4 30. In this matter, Defendant Allen breached this duty by providing public news outlets with
5 false information about Plaintiff, knowing this information was in fact false.

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6 31. As a result of Defendant's actions, Plaintiff has suffered damages in an amount to be
7 determined at trial, but no less than \$5,000,000.00.

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9 CONCLUSION

10 WHEREFORE, the Plaintiff respectfully requests that this Court:

11 1. Award Plaintiff any and all financial, economic and compensatory damages entitled
12 to by law, as determined by a jury, on Counts I-II in addition;
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14 2. Award Plaintiff other monetary damages that they may be entitled to under the law;
15 in addition
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17 3. Award appropriate pre-judgment and post judgment interest; in addition
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19 4. Award expert fees and attorney's fees and cost of this action as may be permitted by
20 law; in addition
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22 5. Award any other relief the Court deems just and appropriate.

23 JURY TRIAL DEMANDED

24 PLAINTIFF DEMANDS A JURY BY TRIAL ON ALL COUNTS.

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26 Respectfully Submitted,

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/S/ FAISAL GILL
Faisal Gill (SBN 463416)

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